## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT SOUTH CAROLINA Columbia Division

DISABILITY RIGHTS SOUTH CAROLINA, ABLE SOUTH CAROLINA, AMANDA McDOUGALD SCOTT, individually and on behalf of P.S., a minor; MICHELLE FINNEY, individually and on behalf of M.F., a minor; LYUDMYLA TSYKALOVA, individually and on behalf of M.A., a minor; EMILY POETZ, individually and on behalf of L.P., a minor; SAMANTHA BOEVERS, individually and behalf of P.B., a minor; TAMICA GRANT, individually and on behalf of E.G. a minor; CHRISTINE COPELAND individually and on behalf of L.C. a minor; HEATHER PRICE individually and on behalf of H.P. a minor; and CATHY LITTLETON individually and on behalf of Q.L. a minor,

Case No. 3:21-cv-02728-MGL

Plaintiffs,

v.

HENRY McMASTER, in his official capacity as Governor of South Carolina; ALAN WILSON, in his official capacity as Attorney General of South Carolina; MOLLY SPEARMAN, in her official capacity as State Superintendent of Education; GREENVILLE COUNTY SCHOOL BOARD; HORRY COUNTY SCHOOL BOARD; LEXINGTON COUNTY SCHOOL BOARD ONE; OCONEE COUNTY SCHOOL BOARD; DORCHESTER COUNTY SCHOOL BOARD; DORCHESTER COUNTY SCHOOL BOARD TWO; CHARLESON COUNTY SCHOOL BOARD; and PICKENS COUNTY SCHOOL BOARD,

Defendants.

Application/Affidavit for Pro Hac Vice Admission

(1)	Name.	<u>Tara</u> First	<u>Lynn</u> Middle	Williamson	
		rirst	Middle	Last	
(2)	Residence.	I reside in the foll	owing state:	Maryland	-
	If a South Carolina resident, indicate months/years of residence:				
(3)	Dusiness A	ddmas I am an at	torney and practice law	under the name of or as a m	nember Of
(3)	the following		ionio, and i	or or us u ii	
	Firm name:		Porter Kaye Scholer LLI		
	Mailing add	ress: 601 Massac	chusetts Ave., NW	City/State/Zip _Was	hington, DC 20001
	•	umber: <u>202-942</u>			
		umber: 202-942			
			mson@arnoldporter.com		
	(Application notification.)		idered without an e-ma	il address to receive electro	nic
(4)	agree to com Carolina, with United States Rule 83.I.08	ply with the applicable in all applicable in all applicable in applicable in and/or Local Cri	licable statutes, laws, and federal statutes, laws, and or the District of South iminal Rule 57.1.08).	olication and Affidavit, connected rules of the State of Sound rules, including Local Resolution (particularly, Local rules) and the jurisdiction of Carolina in all matters of	ith Rules of the cal Civil of the
(5)	•	t of Columbia w	_	nding of the bar of the hig e law. <b>Attached is my ce</b>	
(6)	(List all of the District Court States; and co	e courts Applicants; United States ourts of other states	nt has been admitted to Circuit Courts of App tes or the District of Co	o practice before the follo o practice before: United to eals; the Supreme Court of olumbia.) By signing this of the listed bars unless of	States of the United s Affidavit, I
Cou	ırt		Date Admitted		Good Standing
	strict of Colum	ıbia	9/9/2011		⊠Yes □No
	ryland		12/16/2010		⊠Yes □No
	ryland District	t Court	9/23/2015		⊠Yes □No
_	stern District o		4/17/2015		⊠Yes □No

<sup>&</sup>lt;sup>1</sup>This District maintains a web site (www.scd.uscourts.gov) from which the federal and local rules of procedure and related materials may be obtained.

(7)	Pending Disciplinary Matters. Are you presently the subject of any formal suspension or disbarment proceedings, and have you been notified by any disciplinary agency of the initiation of formal procedures?					
	this paragraph may be provided in camera but that fact shall be revealed below.)					
(8)	Curtailment of Prior <i>Pro Hac Vice</i> Admissions. Have you ever had any application for admission <i>pro hac vice</i> in this or any other jurisdiction denied or any <i>pro hac vice</i> admission revoked?  Yes No (If "yes," give particulars, such as date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation.)					
(9)	Sanctions. Have you ever had any certificate or privilege to appear and practice before any judicial or administrative body suspended or revoked, or received a public reprimand or greater sanction?  Yes No (If "yes," give particulars, e.g., judicial or administrative body, date of suspension, and reinstatement.)					
(10)	Criminal Sanctions. Have you ever been convicted of a felony under the laws of the District of Columbia or of any State or under the laws of the United States?  Yes No (If "yes," give particulars, such as date, court, judge, circumstances, and ultimate disposition.)					
(11)	Present and Previous <i>Pro Hac Vice</i> in this Court. Have you, within the last ten (10) years, filed an application to appear <i>pro hac vice</i> in the United States District Court for the District of South Carolina or another court in the state of South Carolina?  Yes No (If "yes," give court, case name, docket number, and status of litigation, year of application, local counsel of record in each case, and state whether application is pending or was granted.) Attach additional pages if necessary.					
(12)	Designated Local Counsel. Local counsel of record associated with Applicant in this case is:  Attorney Name:  Allen Chaney  Firm Name:  Street Address or Post Office Box:  City, State, and Zip Code:  Telephone Number:  E-Mail Address:  I understand that local counsel of record is required to: (1) personally sign each pleading, motion, discovery procedure, or other document served or filed in this Court; (2) accept service of all					
	D					

pleadings and notices as required on behalf of all counsel for the party represented; (3) be present at all pretrial conferences, hearings and trials, unless excused by the Court; (4) be prepared to participate actively as may be necessary; and (5) assure compliance with Local Civil Rules 83.I.04, 83.I.05, and 83.I.06 or Local Criminal Rules 57.I.04, 57.I.05, and 57.I.06 as appropriate. Local counsel of record may attend discovery proceedings.

(13) Associated Counsel. In addition to local counsel designated above, the following counsel are also associated with the undersigned in this case.

Rita Bolt-Barker (Federal Bar No. 10566)

Adam Protheroe (Federal Bar No. 11033)

B. Randall Dong (Fed. Ct. ID 5989)

Anna Maria Conner (Fed. Ct. ID 5532)

Amanda C. Hess (Fed. Ct. ID 10303)

John Freedman (motion for pro hac vice forthcoming)

Louise Melling (motion for pro hac vice forthcoming)

Susan Mitzner (motion for pro hac vice forthcoming)

- (14) Application Fee. I affirm that the application fee of three hundred and fifty dollars (\$350) has been paid in accordance with Local Civil Rule 83.I.05 or Local Criminal Rule 57.I.05 or paid herewith.
- (15) Electronic Notification. By submitting this application, I consent to electronic notification.
- (16) Represented Party/Parties. I seek to represent the following party/parties:

DISABILITY RIGHTS SOUTH CAROLINA
ABLE SOUTH CAROLINA
AMANDA McDOUGALD SCOTT, individually and on behalf of P.S., a mino
MICHELLE FINNEY, individually and on behalf of M.F., a minor
LYUDMYLA TSYKALOVA, individually and on behalf of M.A., a minor
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CHRISTINE COPELAND individually and on behalf of L.C. a minor
HEATHER PRICE individually and on behalf of H.P. a minor
CATHY LITTLETON individually and on behalf of O.L. a minor

(17) I certify that I have read Local Civil Rule 30.04 regarding the conduct of depositions.

Signature of Applicant

Sworn to and subscribed before me

this 30k day of Angust 2021

A Notary Public

of the State of Manylar

Nova Gaye Dobb

My Commission expires:

notary Public

y Committee on Explose 11/15/202

Revised 08/15/2020

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